

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)

Stacey L. Mullen, Esquire
2091 N. Springdale Road
Suite 17
Cherry Hill, NJ 08003
(856) 778-8677
By: Stacey L. Mullen, Esquire (SM5598)

In Re:
Lamar and Loretta Freeman,

Case No.: ____22-19222
Judge: ____ABA
Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION
X TO CREDITOR'S MOTION OR CERTIFICATION OF DEFAULT
TO TRUSTEE'S MOTION OR CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following (choose one):

1. Motion for Relief from the Automatic Stay filed by creditor
 . A hearing has been scheduled for
 at am

OR

Motion to Dismiss filed by the Standing Chapter 13 Trustee.
A hearing has been scheduled for ___, at _____ am.

Certification of Default filed by creditor, Santander
I am requesting a hearing be scheduled on this matter.

OR

Certification of Default filed by Standing Chapter 13 Trustee
I am requesting a hearing be scheduled on this matter.

I am objecting to the above for the following reasons (choose one):

- Payments have been made in the amount of \$ _____, but have
not been accounted for. Documentation in support is attached hereto.
 Payments have not been made for the following reasons and debtor proposes

repayment as follows (**explain your answer**):

X Other (**explain your answer**): Debtors are Senior Citizens. Mr. Freeman had some recent health issues which affected his ability to keep up to date with the payments. They submit that they made a payment on May 3, 2025 but this payment does not show up on the pay history. They do owe additional monies but ask, in light of their age and limited income, if they can cure their arrears over the next 4-6 months starting in August 2025, resume regular payments in either July or August 2025. Debtors hope that Santander will work with them as they need the vehicle for their medical appointments.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify the above facts to be true. I am aware that if the above facts are willfully false, I am subject to punishment.

Date: 7/2/25

/s/ Lamar Freeman
Debtor's Signature

Date: 7/2/25

/s/ Loretta Freeman
Debtor's Signature

NOTE: Pursuant to the Court's General Orders entered on January 4th, 2005, this form must be filed with the Court and served upon the creditor and the Standing Chapter 13 Trustee, **at least seven (7) days before the return date, pursuant to DNJ LBR 9013-1(d), Motion Practice**, if filed in opposition to a *Motion for Relief from the Automatic Stay; and within 10 days of the filing of a Creditor's Certification of Default under an Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*. Absent the filing of this mandatory new form, the creditor's stay relief motion will be deemed uncontested, and the creditor's appearance at the hearing will **not** be required.

1/3/05/jml